

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re: Chapter 11
WISCONSIN & MILWAUKEE HOTEL, LLC, Case No. 24-21743
Debtor. Honorable G. Michael Halfenger

**SECOND STIPULATION REGARDING DEBTOR'S OBJECTION TO CLAIM
OF COMPUTERSHARE TRUST COMPANY, N.A.**

Computershare Trust Company, N.A. (“Lender”), and Wisconsin & Milwaukee Hotel, LLC (“Debtor”), submit this second stipulation regarding Debtor’s *Objection to Claim and Notice of Opportunity for Hearing* (ECF #377) (the “Claim Objection”), filed in response to Lender’s Claim No. 11 (the “Claim”), and request entry of the order submitted herewith.

RECITALS

A. The Claim Objection includes multiple objections to the Claim, itemized by Debtor as follows, with objection numbers used for ease of reference:

	CTC Claim 11	Debtor's Response	Objection #
Note A Principal	\$35,727,593.94	\$35,676,042.06 per CTC accounting to Debtor	1
Note A Late Payment Fee	\$1,782,988.37	Not permitted	2
Note B Principal	\$2,447,428.81	\$2,444,942.01 per CTC accounting to Debtor	3
Note B Late Payment Fee	\$122,195.21	Not permitted	4
Note C Principal	\$8,113,380.49	\$8,105,136.57 per CTC accounting to Debtor	5
Note C Late Payment Fee	\$405,084.81	Not permitted	6
Trustee Fees	\$7,500	Amount not substantiated	7

B. Lender and Debtor previously resolved Objection Nos. 1, 3, 5, and 7 (collectively, the “Accounting Objections”) by stipulation and order dated March 6, 2025 (ECF #436) (the “First Order”).

C. Pursuant to the First Order, resolution of Debtor’s objection to the secured amount of Lender’s Claim (*see* Claim Objection, ¶¶ 6-8) (the “Secured Claim Objection”), was adjourned to, and is set to be adjudicated at, the confirmation hearing in this case. Following entry of the First Order, Lender made the election contemplated by Bankruptcy Code § 1111(b) (the “1111(b) Election”).

D. Lender and Debtor now wish to resolve Objection Nos. 2, 4, and 6 (collectively, the “Late Fee Objections”) and the Secured Claim Objection on the terms set forth herein.

STIPULATION

In consideration of the foregoing recitals, Lender and Debtor hereby stipulate and agree as follows:

1. Lender is withdrawing the claims identified in the Late Fee Objections, and, accordingly, all of the Late Fee Objections are fully and finally resolved by reducing the Claim by the amount of \$2,310,268 in the aggregate;

2. In light of Lender’s 1111(b) Election, the parties believe that the Secured Claim Objection is now moot. Debtor withdraws its Secured Claim Objection, but all of Lender’s and Debtor’s rights, remedies and defenses are expressly preserved in connection with the determination of the value of Lender’s collateral; and

3. The Court may enter the proposed order submitted herewith.

DATED: April 17, 2025

COMPUTERSHARE TRUST CO., N.A.

BY: /s/ Frank W. DiCastri

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